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	Regional Solicitor		
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6	Seattle, WA 98104 Telephone: (206) 757-6753 Email: Wegman.Karina.E@dol.gov		
7	Attorneys for Plaintiff Secretary of Labor		
8	INITED STATES DIS	TRICT COLIDT	
9	UNITED STATES DIS FOR THE DISTRICT		
10			
11	MARTIN J. WALSH, SECRETARY OF LABOR, UNITED STATES DEPARTMENT	Case No.:	
12	OF LABOR,		
13	Plaintiff,		
14	v. COMPLAINT		
	Violations of Fair Labor Standards		
1.5		L Act ("FLSA") 29 LLS C 88 201 et	
15	URGENT HOME CARE, INC., d/b/a URGENT HOME CARE EDUARD	Act ("FLSA"), 29 U.S.C §§ 201, et seq.	
16	URGENT HOME CARE, INC., d/b/a URGENT HOME CARE, EDUARD SULEYMANOV, an Individual, BETTY		
16 17	URGENT HOME CARE, INC., d/b/a URGENT HOME CARE, EDUARD SULEYMANOV, an Individual, BETTY SULEIMANOV, an Individual, and LAZAR SULIMANOV, an Individual,		
16	URGENT HOME CARE, INC., d/b/a URGENT HOME CARE, EDUARD SULEYMANOV, an Individual, BETTY SULEIMANOV, an Individual, and LAZAR SULIMANOV, an Individual, Defendants.		
16 17			
16 17 18			
16 17 18 19		seq.	
16 17 18 19 20	Defendants.	bor, United States Department of Labor,	
16 17 18 19 20 21	Defendants. Plaintiff Martin J. Walsh, Secretary of La	bor, United States Department of Labor, Home Care, Inc., d/b/a Urgent Home	
16 17 18 19 20 21 22	Defendants. Plaintiff Martin J. Walsh, Secretary of Labrings this action to enjoin Defendants Urgent H	bor, United States Department of Labor, Iome Care, Inc., d/b/a Urgent Home nd Lazar Sulimanov ("Defendants"),	
16 17 18 19 20 21 22 23	Plaintiff Martin J. Walsh, Secretary of Labrings this action to enjoin Defendants Urgent F. Care, Eduard Suleymanov, Betty Suleimanov, as	bor, United States Department of Labor, Home Care, Inc., d/b/a Urgent Home and Lazar Sulimanov ("Defendants"), 5(a)(2), and 15(a)(5) of the Fair Labor	
16 17 18 19 20 21 22 23 24	Plaintiff Martin J. Walsh, Secretary of Labrings this action to enjoin Defendants Urgent F. Care, Eduard Suleymanov, Betty Suleimanov, at from violating provisions of Sections 7, 11(c), 1	bor, United States Department of Labor, Iome Care, Inc., d/b/a Urgent Home nd Lazar Sulimanov ("Defendants"), 5(a)(2), and 15(a)(5) of the Fair Labor 29 U.S.C. §§ 207, 211(c), 215(a)(2) and	
16 17 18 19 20 21 22 23 24 25 26	Plaintiff Martin J. Walsh, Secretary of Labrings this action to enjoin Defendants Urgent F. Care, Eduard Suleymanov, Betty Suleimanov, afrom violating provisions of Sections 7, 11(c), 1 Standards Act of 1938, as amended ("FLSA"), 2	bor, United States Department of Labor, Iome Care, Inc., d/b/a Urgent Home and Lazar Sulimanov ("Defendants"), 5(a)(2), and 15(a)(5) of the Fair Labor U.S.C. §§ 207, 211(c), 215(a)(2) and FLSA to employees of Defendants, as	
16 17 18 19 20 21 22 23 24 25	Plaintiff Martin J. Walsh, Secretary of Labrings this action to enjoin Defendants Urgent F. Care, Eduard Suleymanov, Betty Suleimanov, as from violating provisions of Sections 7, 11(c), 1 Standards Act of 1938, as amended ("FLSA"), 2 15(a)(5) and to recover amounts owed under the	bor, United States Department of Labor, Iome Care, Inc., d/b/a Urgent Home and Lazar Sulimanov ("Defendants"), 5(a)(2), and 15(a)(5) of the Fair Labor U.S.C. §§ 207, 211(c), 215(a)(2) and FLSA to employees of Defendants, as	

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- 1. This Court has subject matter jurisdiction over this action under Section 17 of the FLSA, 29 U.S.C. § 217; this Court also has subject matter jurisdiction over this action under 28 U.S.C. § 1331 (federal question) and § 1345 (United States as Plaintiff).
- 2. (a) Defendant Urgent Home Care, Inc. is and at all relevant times has been a corporation in California with an office and place of business at 14631 N. Cave Creek Road, #204, Phoenix, Arizona 85022, within the jurisdiction of this Court, and has been engaged in business as a residential care facility.
 - (b) On information and belief, Defendant Eduard Suleymanov resides within the jurisdiction of this Court.
 - (c) Defendant Eduard Suleymanov is and at all relevant times has been acting directly or indirectly in the interest of Urgent Home Care, Inc., in relation to the employees of Urgent Home Care, Inc., and is an employer under the FLSA § 3(d), 29 U.S.C. § 203(d).
 - (d) On information and belief, Defendant Betty Suleimanov resides within the jurisdiction of this Court.
 - (e) Defendant Betty Suleimanov is and at all relevant times has been acting directly or indirectly in the interest of Urgent Home Care, Inc., in relation to the employees of Urgent Home Care, Inc., and is an employer under the FLSA § 3(d), 29 U.S.C. § 203(d).
 - (f) On information and belief, Defendant Lazar Sulimanov resides within the jurisdiction of this Court.
 - (g) Defendant Lazar Sulimanov is and at all relevant times has been acting directly or indirectly in the interest of Urgent Home Care, Inc., in relation to the employees of Urgent Home Care, Inc., and is an employer under the FLSA § 3(d), 29 U.S.C. § 203(d).
- 3. Defendants' activities constitute, and at all times material hereto have constituted, related activities performed through unified operation or common control for a common business purpose; and are, and at all times material hereto have been, an "enterprise"

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as defined in the FLSA § 3(r), 29 U.S.C. § 203(r).

- 4. The aforesaid enterprise has, and at all times material hereto has had, employees engaged in commerce or in the production of goods for commerce, or in handling, selling or otherwise working on goods or materials which have been moved in or produced for commerce. Said enterprise has, and at all times material hereto has had, an annual gross volume of sales made or business done (exclusive of any excise taxes at the retail level, if any, that were separately stated) of no less than \$500,000.00; and said enterprise constitutes, and at all times material hereto has constituted, an "enterprise engaged in commerce or in the production of goods for commerce" as defined in the FLSA § 3(s), 29 U.S.C. § 203(s).
- 5. Defendants, individually and jointly, serving as agents for one another, have controlled the material aspects of the employment relationship with all employees at Urgent Home Care, Inc.'s place of business located at 14631 N. Cave Creek Road, #204, Phoenix, Arizona 85022, including, hiring, firing, setting pay rates, setting work schedules, assigning work, and preparing and maintaining pay records; these employees are listed in the attached Exhibit A. As such, Defendants are jointly and severally liable for all back wages due to their employees.
- 6. Defendants have violated the provisions of Sections 7 and 15(a)(2) of the FLSA, 29 U.S.C. § 207 and § 215(a)(2), by employing employees engaged in commerce or in the production of goods for commerce, within the meaning of the FLSA, or employed in an enterprise engaged in commerce or in the production of goods for commerce, within the meaning of the FLSA § 3(s), 29 U.S.C. § 203(s), for workweeks longer than 40 hours without compensating said employees for their employment in excess of 40 hours in such workweeks at rates not less than one and one-half times the regular rates at which they were employed.
- 7. Defendants have violated the provisions of Sections 11(c) and 15(a)(5) of the FLSA, 29 U.S.C. § 211(c) and § 215(a)(5), by failing to maintain, keep, and preserve rec-

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ords of employees and of the wages, hours, and other conditions and practices of employment maintained, as prescribed by the regulations promulgated by the Plaintiff-Secretary pursuant to the authority granted in the FLSA and published in the Federal Register and known as Title 29, Code of Federal Regulations, Part 516.

- 8. (a) During the period from July 19, 2018 to July 20, 2021, Defendants have repeatedly and willfully violated and are violating the above-described provisions of the FLSA.
- (b) As a result of the violations of the monetary provisions of the FLSA, there is unpaid overtime compensation due under the FLSA that is being withheld by the Defendants.
- (c) A judgment permanently enjoining and restraining such violations of the FLSA is specifically authorized by Section 17 of the FLSA, 29 U.S.C. § 217.
- (d) A judgment enjoining and restraining the continued withholding of unpaid overtime compensation due under the FLSA is specifically authorized by Section 17 of the FLSA, 29 U.S.C. § 217.
- (e) Judgment awarding unpaid overtime compensation due under the FLSA, plus an additional amount, as liquidated damages, that is equal to the amount of overtime compensation that accrued under the FLSA, is specifically authorized by FLSA § 16(c), 29 U.S.C. § 216(c).

WHEREFORE, cause having been shown, the Secretary prays for a judgment against Defendants as follows:

- A. For an order pursuant to Section 17 of the FLSA, 29 U.S.C. § 217, permanently enjoining and restraining Defendants, their officers, agents, servants, and employees, and those persons in active concert or participation with them, from prospectively violating the provisions of Sections 15(a)(2) and 15(a)(5) of the FLSA, 29 U.S.C. §§ 215(a)(2) and 215(a)(5); and
 - B. For an order

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(i) pursuant to FLSA § 16(c), 29 U.S.C. § 216(c) finding the Defendants liable for any unpaid overtime compensation that may be found by the Court to be due under the FLSA plus an additional amount as and for liquidated damages, equal to any overtime compensation found to have accrued under the FLSA, to present and former employees of Defendants including the persons listed by name on the attached Exhibit A; or

- (ii) in any instances where liquidated damages are not awarded herein, restraining, pursuant to FLSA § 17, 29 U.S.C. § 217, the Defendants, their officers, agents, servants, and employees and all persons in active concert or participation with them, from continuing to withhold the payment of any unpaid overtime compensation that may be found by this Court to have accrued under the FLSA to present and former employees of Defendants including the persons listed by name on the attached Exhibit A, plus pre-judgment interest thereon; and,
- C. Awarding the Secretary the costs of this action and providing such further legal and equitable relief as may be deemed appropriate.

Dated: September 19, 2022 SEEMA NANDA Solicitor of Labor

MARC A. PILOTIN Regional Solicitor

BORIS ORLOV Counsel for Wage and Hour

/s/ Karina Wegman
KARINA WEGMAN
Trial Attorney

Attorneys for the Plaintiff U.S. Department of Labor

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Exhibit A

First Name **Last Name** Zurama G Aballi Yusuf H Abdulkadir Cecilia Acosta Althea M Agboola Shoruk D Al-Mansori Anar Albanbayeva Atanacia Alcaraz Carrazco Kirill Aleksandrov Abdulgader Allami Nada Alqaysee Diana J Alvarado Marisu Priscilla Alvarez Paola Amaya Thecla J Anau Joan Anderson Teraleen Antonides Christina N Aquino Armida T Arispe Salina M Arispe Fatima Aslanova Jong H Bae Elsa C Bautista Gloria A Bautista Danielle Behan Gennady Benenson Lilya Benenson Diane Benitez Marigret Benjamin Bizimana Bigege Viktoriya Bocharova Galyna Borys Maria M Botello Munoz Marco A Bravo Heyam Brikha Chrishon S Brown Virginia Cano Ledezma Cittlaly Carbajal Julia S Carbajal Genoveva Carrillo

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Tina m Diaz Roxanne M Doty Adela Dover	Moroni	Delgado
Roxanne M Doty Adela Dover	Stephanie I	Delgado
Adela Dover	Tina m	Diaz
	Roxanne M	Doty
Kapinga Drusbosky	Adela	Dover
	Kapinga	Drusbosky
Afroz J Dulara	Afroz J	Dulara
Iqbal P Dulara	Iqbal P	Dulara
Ronneil Duncan	Ronneil	Duncan
Christine S Dunn	Christine S	Dunn
Christopher Edmond	Christopher	Edmond
Dora O Edosomwan	Dora O	Edosomwan
Brian M Edwards	Brian M	Edwards
Maria L Eldredge	Maria L	Eldredge
Priscilla Elthie	Priscilla	Elthie
Reyna Escobar	Reyna	Escobar
Eddy T Escobar De Vega	Eddy T	Escobar De Vega
Aidee Espinoza	Aidee	Espinoza
Dora E Espinoza	Dora E	Espinoza
Lupe G Estavillo	Lupe G	
Elsa Facio	Elsa	Facio
Juan Fernandez	Juan	Fernandez

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Natalia Guk Ella Hadar Georgia Haggard Rana S Hano Charmela M Harris Oneida A Henriquez Babur Hirmendi Monique S Hobbs Carlene Hoshaine Michelle Inda Marks Iskhakov Jasmine Jackson Agustina Jimenez Deshanai Jones Joy Judge Hawa Kabba Gulistan Kayayeva Leilani Keller Ekaterina Kiepke Donoven C King Elena Kmet Alexander Kocharov Aferdita Kosovrasti Gasaia Kourieh Belia Lapidus	Vanessa N	Gonzales
Ella Hadar Georgia Haggard Rana S Hano Charmela M Harris Oneida A Henriquez Babur Hirmendi Monique S Hobbs Carlene Hoshaine Michelle Inda Marks Iskhakov Jasmine Jackson Agustina Jimenez Deshanai Jones Joy Judge Hawa Kabba Gulistan Kayayeva Leilani Keller Ekaterina Donoven C King Elena Kmet Alexander Kocharov Aferdita Kosovrasti Gasaia Kourieh Belia Lapidus	Dina	Gorodishter
Georgia Rana S Hano Charmela M Harris Oneida A Henriquez Babur Hirmendi Monique S Hobbs Carlene Hoshaine Michelle Inda Marks Jasmine Jackson Agustina Jones Joy Judge Hawa Kabba Gulistan Leilani Ekaterina Donoven C Elena Alexander Aferdita Gasaia Babur Hano Harris Henriquez Harris Henriquez Harris Henriquez Harris Henriquez Hababa Henriquez Hoshaii Johs Harris Henriquez Hoshaii Hoshaine Hoshaine Hoshaine Harris Henriquez Hoshaii Hoshaine Hoshaine Hoshaine Hoshaine Harris Henriquez Hoshaine Hoshaine Hoshaine Hoshaine Hoshaine Harris Hoshaine Hoshai	Natalia	Guk
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Monique S Carlene Hoshaine Michelle Inda Marks Iskhakov Jasmine Jackson Agustina Jimenez Deshanai Jones Joy Judge Hawa Kabba Gulistan Kayayeva Leilani Ekaterina Kiepke Donoven C Elena Kmet Alexander Aferdita Kosovrasti Gasaia Kourieh Belia Hobbs Hoshaine Hoshaine Inda Hoshaine Iskhakov Jamenez Judge Hawa Kabba Gulistan Kayayeva Leilani Keller Ekaterina Kiepke Donoven C King Elena Kmet Alexander Alexander Aferdita Kosovrasti Gasaia Kourieh Belia	Oneida A	Henriquez
Carlene Hoshaine Michelle Inda Marks Iskhakov Jasmine Jackson Agustina Jimenez Deshanai Jones Joy Judge Hawa Kabba Gulistan Kayayeva Leilani Keller Ekaterina Kiepke Donoven C King Elena Kmet Alexander Kocharov Aferdita Kosovrasti Gasaia Kourieh Belia Lapidus	Babur	Hirmendi
Carlene Hoshaine Michelle Inda Marks Iskhakov Jasmine Jackson Agustina Jimenez Deshanai Jones Joy Judge Hawa Kabba Gulistan Kayayeva Leilani Keller Ekaterina Kiepke Donoven C King Elena Kmet Alexander Kocharov Aferdita Kosovrasti Gasaia Kourieh Belia Lapidus	Monique S	Hobbs
MarksIskhakovJasmineJacksonAgustinaJimenezDeshanaiJonesJoyJudgeHawaKabbaGulistanKayayevaLeilaniKellerEkaterinaKiepkeDonoven CKingElenaKmetAlexanderKocharovAferditaKosovrastiGasaiaKouriehBeliaLapidus	-	Hoshaine
Jasmine Jackson Agustina Jimenez Deshanai Jones Joy Judge Hawa Kabba Gulistan Kayayeva Leilani Keller Ekaterina Kiepke Donoven C King Elena Kmet Alexander Kocharov Aferdita Kosovrasti Gasaia Kourieh Belia Lapidus	Michelle	Inda
Agustina Jimenez Deshanai Jones Joy Judge Hawa Kabba Gulistan Kayayeva Leilani Keller Ekaterina Kiepke Donoven C King Elena Kmet Alexander Kocharov Aferdita Kosovrasti Gasaia Kourieh Belia Lapidus	Marks	Iskhakov
Deshanai Jones Joy Judge Hawa Kabba Gulistan Kayayeva Leilani Keller Ekaterina Kiepke Donoven C King Elena Kmet Alexander Kocharov Aferdita Kosovrasti Gasaia Kourieh Belia Lapidus	Jasmine	Jackson
Joy Judge Hawa Kabba Gulistan Kayayeva Leilani Keller Ekaterina Kiepke Donoven C King Elena Kmet Alexander Kocharov Aferdita Kosovrasti Gasaia Kourieh Belia Lapidus	Agustina	Jimenez
Hawa Kabba Gulistan Kayayeva Leilani Keller Ekaterina Kiepke Donoven C King Elena Kmet Alexander Kocharov Aferdita Kosovrasti Gasaia Kourieh Belia Lapidus	Deshanai	Jones
Gulistan Kayayeva Leilani Keller Ekaterina Kiepke Donoven C King Elena Kmet Alexander Kocharov Aferdita Kosovrasti Gasaia Kourieh Belia Lapidus	Joy	Judge
Leilani Keller Ekaterina Kiepke Donoven C King Elena Kmet Alexander Kocharov Aferdita Kosovrasti Gasaia Kourieh Belia Lapidus	Hawa	
Leilani Keller Ekaterina Kiepke Donoven C King Elena Kmet Alexander Kocharov Aferdita Kosovrasti Gasaia Kourieh Belia Lapidus	Gulistan	Kayayeva
Donoven C King Elena Kmet Alexander Kocharov Aferdita Kosovrasti Gasaia Kourieh Belia Lapidus	Leilani	
Donoven C King Elena Kmet Alexander Kocharov Aferdita Kosovrasti Gasaia Kourieh Belia Lapidus	Ekaterina	Kiepke
Elena Kmet Alexander Kocharov Aferdita Kosovrasti Gasaia Kourieh Belia Lapidus	Donoven C	•
Aferdita Kosovrasti Gasaia Kourieh Belia Lapidus	Elena	i
Gasaia Kourieh Belia Lapidus	Alexander	Kocharov
Gasaia Kourieh Belia Lapidus	Aferdita	Kosovrasti
Belia Lapidus	Gasaia	Kourieh
	Belia	Lapidus
	Denise	

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Olivia C	Lee
Cairo	Leyba
Jose J	Lopez
Lily	Lopez
Maria M	Lugo Maria
Eric H	Lundberg
Rosa A	Macias
Nikia R	Madsen
Marietta	Magpulong
Delisa P	Marentez
Jaheni	Marquez
Pearl	Marquez
Priscilla B	Martin-Picard
Kathleen M	Martinez
Shahla	Masroor
Dawn J	McFarland
Joyce A	McNeil
Franco O	Mena
Evin D	Messina
Firdews	Mjejel
Eula M	Monte
Gustavo	Montes
Luz E	Morfin
Summer	Morgan
Lynerose	Morris
Noelle C	Morris
Rose M	Mose
Deena M	Mufarreh
Lourdia	Myrthil
Hermine	Nahabedian
Genesis	Naveju Castillo
Phuong M	Nguyen
Rosa Maria	Nieto
Rita	Ohannessian
Valentina R	Oliver
Javier A	Ontiveros
Anabel	Ornelas
Sixta	Orozco
Barbara L	Pacheco
Teah A	Padmore
Mabel J	Palacio
Kathleen	Parker
Sonia	Pavlov
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Delia	Perez
Lucia	Perez
Sylvia H	Phillips
Michelle W	Piper
Ashley N	Prince
Alexander B	Priyev
Kelli N	Ramirez
Zaheda	Ramjag
Evan T	Raynovic
Vladislav G	Razmyslovich
Irma Del Carmen	Renteria
Susan	Resendes
Rosa	Reveles
Angel J	Reyes Lopez
Petra A	Reyna
Ferdinand V	Rillera
Norma A	Rios
Estela	Rios Leon
Lorraine M	Rivera
Raymond A	Robles
Lebecca A	Roeschen
Svitlana	Roethler
Erika V	Romero
Cierra J	Rosales
Shokhsina	Sadayeva
Stella	Sadykova
Alicia Marquez	Saenz
Kevin	Sagiyan
Sviatlana N	Sakalova
Dalia	Salado
Michael	Saman
Rafael A	Saman
Nikolay	Samoylich
Olga	Samoylich
Timofey	Samoylich
Enedina	Sanchez
Vanessa	Sandoval Fierro
Aarin R	Santiago
Candace E	Satterfield
Svitlana R	Savchuk
Iris	Serrano
Galina	Shevchenko
Oksana	Shulim

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Eskedar G	Shura
Dawn	Simon
Dunya	Slewo
Hermelinda	Solano
Derek P	Stevens
Shellee J	Suber
Pashan N	Sueing
Yelena G	Sufich
Zulfiya	Suleymanova
Lola	Tairova
Taba	Tehrani
Ruby	Tena
Emilia	Thomas
Elena	Thornton
Mykaela	Tyler
Irina	Udriss
Mykolas	Vaidilauskas
Marlene	Van Winkle
Joanne	Vandermeer
Alondra A	Vasquez
Andrea	Vazquez
Aleksandr	Veksler
Graciela	Velazquez
Luz E	Velez
James	Wannah
Brandon C	Ward
Cynthia L	Washington
Nancy	Whayee
Barbaraann	Whitley
Gloria	Whitmore
Felicia B	Williams
Evelyn	Wilson
Jacklin	Yakinian
Isfira	Yakubova
Inna	Yatsenko
Edrozen Faron	Yazzie
Mercedes	Ybarra
Willam H	Yonan
Ronen	Yusupov
Nick	Zahreddine
Adriana	Zaldivar
Nina	Zamoshkin

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